

**FILED UNDER SEAL**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS**

United States Courts  
Southern District of Texas  
**FILED**

**OCT 25 2024**

**UNITED STATES OF AMERICA,**

Plaintiff,

*ex rel.* **RELATOR LLC**, a California limited  
liability company,

Relator,

v.

**CASEY PAULSON**, an individual, **ANDY  
MITCHELL**, an individual, **BLUEJACK  
DEVELOPMENT CO, LLC**, a Delaware  
limited liability company, **THE BLUEJACK  
COMPANY, LLC**, a Delaware limited  
liability company, and **DOES 1-10**,

Defendants.

Case No.

**Nathan Ochsner, Clerk of Court**

**JURY TRIAL DEMANDED**

**MOTION TO SEAL COMPLAINT FOR VIOLATIONS OF  
FEDERAL FALSE CLAIMS ACT**

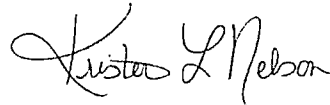
Relator RELATOR LLC (hereinafter referred to as “Relator”) respectfully moves this Court for an Order sealing the Complaint filed in this matter for 60 days.

The False Claims Act requires that a *qui tam* action must be filed under seal and remain sealed for at least 60 days. This procedure enables the government to investigate the matter, so that it may decide whether to take over the relator’s action or to instead allow the relator to litigate the action in the government’s place. The purpose of the seal provision is to avoid alerting defendants to a pending federal criminal investigation. *State Farm Fire and Cas. Co. v. U.S.*, 137 S. Ct. 436 (2016).

The “sealing period, in conjunction with the requirement that the government, but not the defendants, be served, was ‘intended to allow the Government an adequate opportunity to fully evaluate the private enforcement suit and determine both if that suit involves matters the Government is already investigating and whether it is in the Government’s interest to intervene and take over the civil action.’” *United States ex rel. Pilon v. Martin Marietta Corporation*, 60 F.3d 995, 998-99 (quoting S. Rep. No. 345, 99th Cong., 2d Sess. 24, reprinted in 1986 U.S.C.C.A.N. 5266, 5289).

Relator respectfully requests that the Court grant its Motion to Seal these proceedings as required by statute.

Dated: October 22, 2024

A handwritten signature in cursive script, reading "Kristen L. Nelson", positioned above a horizontal line.

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